

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

SARA S. ECHEVARRIA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	NO.: 05-284 GMS
	)	
ROGER MAYFIELD,	)	
NATIONWIDE GENERAL	)	TRIAL BY JURY DEMANDED
INSURANCE COMPANY, and U-	)	
HAUL CO. OF FLORIDA,	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT  
AGAINST ROGER MAYFIELD**

Plaintiff moves for entry of a default judgment against Roger Mayfield in the amount of \$125,000 plus costs and post-judgment interest and, in support thereof, states as follows:

1. Defendant Roger Mayfield failed to appear after the time for doing so expired and, therefore, a default was entered by the Clerk on 10/5/2005. (D.I # 20).

2. The case proceeded to a jury trial against all defendants beginning Monday, March 5, 2007. On March 9, 2007, the jury returned a Special Verdict finding U-Haul Company of Florida not negligent. The jury also found Roger Mayfield negligent. The jury determined the plaintiff's damages to be \$125,000.

3. Subsequent to trial, plaintiff reached a confidential resolution of her claims against Nationwide General Insurance Company. In accordance with that resolution, a Stipulation of Dismissal of all claims by Plaintiff against Nationwide General Insurance Company was filed with the Court on 3/20/07 (D.I. #101).

4. In accordance with FRCP 55(b)(2), plaintiff requests that the Court enter judgment by default against Roger Mayfield in accordance with the jury's Special Verdict in the amount of \$125,000. Plaintiff also requests that the judgment reflect that plaintiff's statutorily entitled costs be taxed against Roger Mayfield and that the judgment will incur post-judgment interest at the appropriate legal rate. Plaintiff anticipates filing and serving her Bill of Costs at the appropriate time pursuant to FRCP 54 and D. Del. LR 54.1.

**WHEREFORE**, plaintiff respectfully requests that the Court enter judgment by default against Roger Mayfield including costs and post-judgment interest.

MURPHY & LANDON

/s/ Roger D. Landon  
ROGER D. LANDON, No. 2460  
CHASE T. BROCKSTEDT, No. 3815  
1011 Centre Road, #210  
Wilmington, DE 19805  
(302) 472-8112  
Attorneys for Plaintiff

Dated: 3/20/2007

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**CERTIFICATE OF SERVICE**

I, Roger D. Landon, Esq., do hereby certify that on this 20<sup>th</sup> day of March, 2007, copies of the foregoing **PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST ROGER MAYFIELD** were delivered via electronic filing to the following individual(s):

Stephen L. Caponi, Esquire  
Blank Rome, LLP  
Chase Manhattan Centre  
1201 Market Street, Suite 800  
Wilmington, DE 19801

Robert J. Leoni, Esquire  
Michael J. Logullo, Esquire  
Shelsby & Leoni  
221 Main Street  
Wilmington, DE 19804

Francis H. LoCoco, Esquire  
Quarles & Brady LLP  
411 East Wisconsin Avenue  
Milwaukee, WI 53122

Robert K. Pearce, Esq.  
Ferry Joseph & Pearce  
824 N. Market Street, #904  
Wilmington, DE 19801

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ROGER D. LANDON, No. 2460  
CHASE T. BROCKSTEDT, No. 3815  
1011 Centre Road, #210  
Wilmington, DE 19805  
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